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**UNITED STATES DISTRICT COURT**  
**NORTHERN DISTRICT OF CALIFORNIA**  
**SAN JOSE DIVISION**

MAXIMILIAN KLEIN, et al., on behalf of  
themselves and all others similarly situated,

Plaintiffs,

v.

META PLATFORMS, INC., a Delaware  
Corporation,

Defendant.

Case No. 3:20-cv-08570-JD

**[PROPOSED] ORDER REGARDING  
ADVERTISER PLAINTIFFS'  
ADMINISTRATIVE MOTION TO  
CONSIDER WHETHER ANOTHER  
PARTY'S MATERIAL SHOULD BE  
SEALED**

Judge: Hon. James Donato

THIS MATTER, having come before the Court on Advertiser Plaintiffs' Administrative Motion to Consider Whether Another Party's Material Should be Sealed, filed concurrently with Advertiser Plaintiffs' discovery dispute letter, dated July 27, 2022 (the "Letter"), and the Court having considered Defendant's Response to Advertiser Plaintiffs' Administrative Motion to Consider Whether Another Party's Material Should be Sealed, and other appropriate papers:

The Court finds compelling reasons to support the filing under seal of the portions of the Letter described herein. Accordingly,

IT IS ORDERED that the following portions of the Letter shall be filed under seal and sealed from the public record:

Portions to be filed Under Seal	Reason for Sealing
Redacted current and former non-officer employee names.	Letter contains the names of Defendant's current and former non-officer employees, which, if revealed could subject those employees to harassment, annoyance, oppression, or undue burden.
Redacted current and former officer and employee email addresses.	Letter contains the email addresses of Defendant's current and former officers and employees, which, if revealed could subject those officers and employees to harassment, annoyance, oppression, or undue burden.

IT IS FURTHER ORDERED that the Advertiser Plaintiffs shall re-file the Letter on the public docket with only such portions described above redacted.

**IT IS SO ORDERED.**

Dated: August \_\_\_\_\_, 2022

\_\_\_\_\_  
The Honorable James Donato  
United States District Court Judge